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Attorneys for the Trust Defendants (defined below)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Richard Klein, Raymond Urias, and Sandra J.
Gunter, individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

National Collegiate Student Loan Trust 2005-3
et al.,

Defendants.

Case No.: 2:22-cv-01392-GMN-BNW

**MOTION TO EXTEND TIME TO FILE
CORRECTED VERIFIED PRO HAC
VICE PETITION (FIRST REQUEST)**

1 Defendants National Collegiate Student Loan Trust 2005-3, National Collegiate Student
2 Loan Trust 2006-3, National Collegiate Student Loan Trust 2007-1, National Collegiate Student
3 Loan Trust 2007-2, National Collegiate Student Loan Trust 2007-3, and National Collegiate
4 Student Loan Trust 2007-4 (together, the “Trust Defendants”) hereby file this request to extend
5 the time to correct the Verified Petition to Pro Hac Vice filed by Petitioner Julia C. Webb [ECF
6 No. 67] (“Verified Petition”) on May 22, 2023.

7 On May 23, 2023, this Court entered a Minute Order stating that the Verified Petition was
8 insufficient because it did not provide the completed form required by LR IA 11-2(d) and that a
9 corrected Verified Petition needed to be entered by no later than May 29, 2023 [ECF No. 68].
10 Counsel for the Trust Defendant did not use the required form because it did not believe it was
11 necessary as Ms. Webb comes from a firm, Locke Lord LLP, that the Trust Defendants
12 representative and local counsel had already agreed could represent the Trust Defendants in the
13 application of other attorneys appearing pro hac vice on behalf of the Trust Defendants [ECF No.
14 9-11].

15 To be compliant with LR IA 11-2(d) and the Minute Order, counsel for the Trust
16 Defendants will need additional time from the current deadline of May 29, 2023, to obtain the
17 signature of the Trust Defendants’ representative because the current deadline is a holiday, and the
18 representative will not be available to sign the appropriate form approving Ms. Webb’s appearance
19 pro hac vice until after that date.

20 Therefore, the Trust Defendants respectfully request that this Court extend the time for the
21 Trust Defendants to file a corrected Verified Petition up until June 2, 2023. This extension is
22 necessary because as the Minute Order points out, the denial of the Verified Petition will require
23 the repayment of the filing fee.

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1 This is the first motion for an extension of time for Defendants to complete the Pro Hac
2 Vice Application of Julie Webb. The extension is requested in good faith and is not for purposes
3 of delay or prejudice to any other party.

4 DATED this 26th day of May, 2023.

5 LOCKE LORD LLP

6 /s/ Gregory T. Casamento
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21 /s/ Ramir M. Hernandez
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Attorneys for the Trust Defendants

IT IS SO ORDERED:

UNITED STATES DISTRICT COURT
JUDGE

DATED: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **MOTION TO EXTEND TIME TO FILE CORRECTED VERIFIED PRO HAC VICE PETITION (FIRST REQUEST)** on the 26th day of May, 2023, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP